

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

COMMWORKS SOLUTIONS, LLC,

Plaintiff,

v.

COMCAST CABLE COMMUNICATIONS,  
LLC AND COMCAST CABLE  
COMMUNICATIONS MANAGEMENT,  
LLC,

Defendants.

Civil Action No.: 6:21-cv-00366-ADA

**Jury Trial Demanded**

**DECLARATION BY BRANDON G. MOORE**

I, Brandon G. Moore, declare as follows:

1. I am an attorney at Kheyfits Belenky LLP, attorneys for the Plaintiff in this matter, CommWorks Solutions, LLC. I have personal knowledge of the facts set forth in this declaration and could testify competently to those facts.

2. Exhibit 1 is a true and correct copy of the Joint Claim Construction and Prehearing Statement (Dkt. No. 29) filed in *CommWorks Solutions, LLC v. Cable One, Inc. et al.*, Civil Action No.: 2:20-CV-158-JRG (E. D. Tex.).

3. Exhibit 2 is a true and correct copy of the Joint Claim Construction and Prehearing Statement (Dkt. No. 35) filed in *CommWorks Solutions, LLC v. Mediacom Communications Corp.*, Civil Action No.: 1:20-cv-7529-LGS (S. D. N. Y.).

4. Exhibit 3 is a true and correct copy of the Amended Joint Disputed Claim Terms Chart (Dkt. No. 54) filed in *CommWorks Solutions, LLC v. RCN Telecom Services, LLC*, Civil

Action No.: 1:20-cv-7534-MKV (S. D. N. Y.).

5. Exhibit 4 is a true and correct copy of an excerpt from the “The New IEEE Standard Dictionary of Electrical and Electronics Terms” by Gediminas P. Kurpis (1996) bearing production numbers CW\_CC\_00000032 – CW\_CC\_00000033, and CW\_CC\_00000037.

6. Exhibit 5 is a true and correct copy of excerpts from “Efficient Topology Management and Geographic Routing in High-Capacity Continental-Scale Airborne Networks” by Benjamin D. Newton (2017).

7. Exhibit 6 is a true and correct copy of an excerpt from the “Dictionary of Computing” Sixth ed. (2008) bearing production numbers CW\_CC\_00000004 – CW\_CC\_00000005 and CW\_CC\_00000009.

8. Exhibit 7 is a true and correct copy of U.S. Patent No. 5,892,754.

9. Exhibit 8 is a true and correct copy of CommWorks’ Disclosure of Extrinsic Evidence served in this action.

10. Exhibit 9 is a true and correct copy of the Oct. 7, 2021 Email from B. Moore to counsel for Comcast.

11. Exhibit 10 is a true and correct copy of CommWorks’ Revised Proposed Claim Constructions served in this action.

12. Exhibit 11 is a true and correct copy of U.S. Patent Application Publication No. US 2003/0189919 A1.

13. Exhibit 12 is a true and correct copy of Technical Report TR 23.821 V1.0.1 (2000-07).

14. Exhibit 13 is a true and correct copy of excerpts from “Understanding the Home Subscriber Server (HSS) Sh interface” by Stefano Gioia (2006) at

<https://www.oracle.com/technical-resources/articles/enterprise-architecture/home-subscriber-server-part1.html> bearing production numbers CW\_CC\_00000069 – CW\_CC\_00000071.

15. Exhibit 14 is a true and correct copy of “Serving – Call Session Control Function” (MPIRICAL) at <https://www.mpirical.com/glossary/s-cscf-serving-call-session-control-function> bearing production number CW\_CC\_00000068.

16. Exhibit 15 is a true and correct copy of an excerpt from the “An Introduction to LTE” by Christopher Cox (2012) bearing production numbers CW\_CC\_00000061 – CW\_CC\_00000063.

17. Exhibit 16 is a true and correct copy of “IMS VoLTE Architecture” (3GLTEinfo) at <https://www.3glteinfo.com/ims-volte-architecture/> bearing production numbers CW\_CC\_00000064 – CW\_CC\_00000067.

Dated: November 5, 2021

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/s/ Brandon G. Moore  
Brandon G. Moore